



Department of Energy  
Idaho Operations Office  
1955 Freemont Avenue  
Idaho Falls, Idaho 83415

CCN 53326

October 21, 2004

Joy Stuart  
Administrative Record Coordinator  
Information Repository  
BBWI, Inc.  
1955 Freemont Ave., MS 3940  
Idaho Falls, ID 83415

SUBJECT: Summary of the Conference Call Regarding the Group 6 Buried Gas Cylinder Remediation Approach Related to the RD/RA Work Plan for Information Repository (FMDP-FFA/CO-04-045)

Dear Sirs,

This letter documents for the Information Repository the agency conference call held on Thursday, October 14, 2004, concerning remediation efforts of Operable Unit 3-13, Group 6, Buried Gas Cylinders. At issue were required changes in field approach, given the discovery of hydrogen fluoride, to remediate the cylinders in relation to the detailed methods described in the Remedial Design/Remedial Action Work Plan for Operable Unit 3-13, Group 6, Buried Gas Cylinders (DOE/ID-10838).

Items of discussion during this call included (1) evolution of the RD/RA Work Plan and how it was originally developed, (2) the current approach for remediation of the gas cylinders, and (3) several operational items/approaches described in the current work plan that will not be implemented in the field. The actions described in the RD/RA work plan were associated with treatment and disposal of common construction gases and did not accommodate hazardous gases such as chlorine and hydrogen fluoride. Consequently, other methods were implemented to safely and compliantly remove and treat the gases encountered during remediation. Although the specific techniques and equipment being utilized during the action are different, the end-state goals remain unchanged. As required by the FFA/CO, a summary of the remediation activities and final conditions will be provided in the Remedial Action Report to further document the Group 6 action.

The attachments to this letter are e-mails detailing the understanding from the conference call and concurrence from Dennis Faulk and Ted Livieratos on the current and active remediation approach.

If you have questions or need additional information, please contact me at (208) 526-7001.

Sincerely,

A handwritten signature in cursive script, reading "Mary C Verwolf", is written over a horizontal line.

Mary C Verwolf, Acting WAG 3 Project Manager  
Environmental Restoration Program

## ATTACHMENTS:

1. E-mail correspondence from Martin Doornbos (BBWI) to Mary Verwolf (NE-ID), Dennis Faulk (EPA), and Ted Livieratos (IDEQ), 10/14/2004, 01:41 PM.
2. E-mail correspondence from Dennis Faulk (EPA) to Martin Doornbos (BBWI), 10/14/2004, 02:15 PM.
3. E-mail correspondence from Ted Livieratos (IDEQ) to Dennis Faulk (EPA), Mary Verwolf (NE-ID), and Martin Doornbos (BBWI), 10/14/2004, 06:13 PM.

cc: T. Livieratos, ID DEQ, 1410 N. Hilton, Boise, ID 83706  
D. Faulk, EPA Region X, 712 Swift Blvd., Suite 5, Richland, WA 99352  
K. Ivy, EPA Region X, 1200 Sixth Avenue, Seattle, WA 98101

EXTERNAL bcc DISTRIBUTION:

ARDC, BBWI, MS 3940  
D. Kuhns, BBWI, MS 3419  
M. Doornbos, BBWI, MS 3419

ID DISTRIBUTION:

CONCURRENCE: N/A

M. Verwolf (EM/ER), MS 4149 (1)  
~~K. Ham (EM), MS 1222~~  
J. Cooper (INTEC), MS 1154  
A. Kraupp, MS 1226

RECORD NOTES:

1. This transmits the Summary of the Conference Call Regarding the Group 6 Buried Gas Cylinder Remediation Approach Related to the RD/RA Work Plan for Information Repository.
2. M. Verwolf prepared this letter.
3. This letter/memo closes CATS number N/A.
4. The attached correspondence has no relation to the Naval Nuclear Propulsion Program. Naval Reactors concurrence is not required.

## **Verwolf, Mary C**

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**From:** Doornbos, Martin H  
**Sent:** Thursday, October 14, 2004 1:42 PM  
**To:** Verwolf, Mary C; faulk.dennis@epamail.epa.gov; TED LIVIERATOS  
**Cc:** Davison, Lee; Kuhns, Douglass J; Varvel, Mark D; Williams, Jack S  
**Subject:** Agency Call Concerning Group 6 Buried Gas Cylinder Operations

An Agency conference call was held on Thursday, October 14, to discuss the approach for remediation of the Group 6 Buried Gas Cylinders. At issue was the current field approach to remediate these cylinders is different than the approach described in the Remedial Design/Remedial Action Work Plan for Operable Unit 3-13, Group 6, Buried Gas Cylinders (DOE/ID-10838).

Discussed during the call was (1) evolution of the work plan and how it was originally developed, (2) the current approach for remediation of the gas cylinders, and (3) several actions described in the current work plan (eg., polycarbonate mobile barricades, magnetometer surveys every six inches, Schilling T3 remote-control lifting device, etc.) that are not going to be implemented in the field. These actions are described in the RD/RA work plan, but are not required to safely and compliantly implement the remediation.

### Conclusion:

(1) This email documents EPA (D. Faulk) and DEQ (T. Liveratos) concurrence with the current approach to remediate the gas cylinders, which does not require all the items identified in the RD/RA work plan, as long as the remedial action objectives are met. It is still the responsibility of DOE and it's contractor to safely perform the work.

(2) A letter to file from DOE (M. Verwolf) will be placed in the Administrative Record to document the changes in the remediation approach from what is described in the RD/RA work plan. This letter will also be sent (cc:) to EPA (D. Faulk) and DEQ (T. Liveratos). Ultimately, this will be documented in the Remedial Action Report.

We appreciate your time and willingness to help us succeed on this project. If you have any questions, please let me know.

Martin Doornbos, P.E., P.G.  
INTEC SP6 Project Engineer  
208.526.0676 office  
208.521.7839 cell

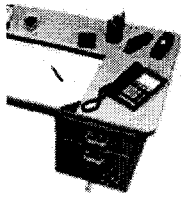
**Verwolf, Mary C**

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**From:** Faulk.Dennis@epamail.epa.gov  
**Sent:** Thursday, October 14, 2004 2:16 PM  
**To:** Doornbos, Martin H  
**Cc:** Kuhns, Douglass J; Davison, Lee; TED LIVIERATOS; Varvel, Mark D; Verwolf, Mary C; Williams, Jack S  
**Subject:** Re: Agency Call Concerning Group 6 Buried Gas Cylinder Operations

I concur with the approach detailed in the email.

Dennis Faulk  
EPA WAG 3 RPM



Sheryll R  
Scott/STAYSR/CC01/INEEL/  
US

11/05/2004 11:29 AM

To Joy C Stuart/TUA/CC01/INEEL/US@INEL

cc

bcc

Subject Fw: Agency Call Concerning Group 6 Buried Gas Cylinder  
Operations

Per Carolyn's request here is the correspondence you need.

----- Forwarded by Sheryll R Scott/STAYSR/CC01/INEEL/US on 11/05/2004 11:28 AM -----



"TED LIVIERATOS"  
<TLIVIERA@deq.state.id.us>

10/14/2004 06:13 PM

To <faulk.dennis@epamail.epa.gov>,  
<VERWOLMC@Exchange.inel.gov>, <DOORMH@inel.gov>  
cc "DARYL KOCH" <DKOCH@deq.state.id.us>,  
"MARGARETHA ENGLISH" <MENGLISH@deq.state.id.us>,  
<DKH@inel.gov>, <RAN@inel.gov>, <VARVMD@inel.gov>,  
<WSJ@inel.gov>

Subject Re: Agency Call Concerning Group 6 Buried Gas Cylinder  
Operations

Along with Dennis Faulk, I also concur with the approach in the email.

>>> <DOORMH@inel.gov> 10/14/04 01:41PM >>>

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remedial action objectives are met. It is still the responsibility of DOE and it's contractor to safely perform the work.

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